

ORIGINAL

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

DEPUTY CLERK *AA*

UNITED STATES OF AMERICA

v.

NO. 3:18-CR-6-D

MARICELLA NICOLE SEGOVIANO (3)

FACTUAL RESUME

In support of Segoviano's plea of guilty to the offense in Count 6 of the Third Superseding Indictment, Segoviano, the defendant, Kendall Castello, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offense alleged in Count 6 of the Third Superseding Indictment, charging a violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), that is, Possession with Intent to Distribute a Controlled Substance, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That the defendant knowingly possessed a controlled substance;
- Second.* That the substance was in fact a mixture or substance containing a detectable amount of methamphetamine; and
- Third.* That the defendant possessed the substance with the intent to distribute it.

¹ Pattern Crim. Jury Instr. 5th Cir. 2.93 (2015).

STIPULATED FACTS

1. On or about July 11, 2017, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Maricella Nicole Segoviano**, knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) & (b)(1)(C).

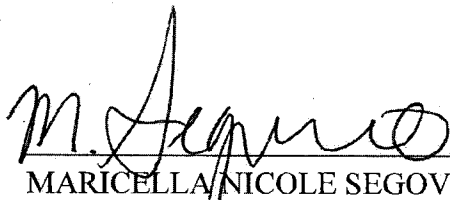
More specifically, on July 11, 2017, in the Dallas Division of the Northern District of Texas, Segoviano was possession of 161 grams of methamphetamine as she fled from law enforcement. Segoviano was in possession of this methamphetamine with an intent to distribute it. Segoviano was also in possession of two firearms in furtherance of her drug-trafficking activities.


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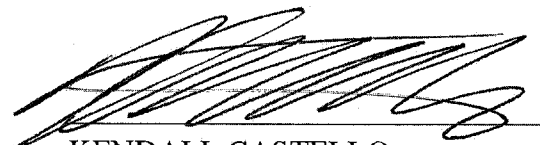
2. The defendant agrees that the defendant committed all the essential elements of the offense. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count 6 of the Third Superseding Indictment.

AGREED TO AND STIPULATED on this 5th day of June, 2018.

ERIN NEALY COX
UNITED STATES ATTORNEY


MARICELLA NICOLE SEGOVIANO
Defendant


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